

EXHIBIT A

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6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF ARIZONA**

8 IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

9 **AMENDED MASTER SHORT FORM**
10 **COMPLAINT FOR DAMAGES FOR**
INDIVIDUAL CLAIMS AND DEMAND
11 **FOR JURY TRIAL**

12 Plaintiff(s) named below, for their Complaint against Defendants named below,
13 incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc.364).

14 Plaintiff(s) further show the Court as follows:

- 15 1. Plaintiff/Deceased Party:

16 Tamara Holcomb

- 17 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
18 consortium claim:

19 n/a

- 20 3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,
21 conservator):

22 n/a

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of implant:

~~Louisiana~~Ohio

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of injury:

~~Mississippi~~Florida

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

~~Mississippi~~Florida

7. District Court and Division in which venue would be proper absent direct filing:

USDC for the District of New Jersey, USDC for the District of ~~Mississippi~~Ohio, USDC for the District of ~~Louisiana~~Florida

8. Defendants (check Defendants against whom Complaint is made):

☒ C.R. Bard Inc.

☒ Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

☒ Diversity of Citizenship

☐ Other: _____

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

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10. Defendants’ Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

- ☐ Recovery® Vena Cava Filter
- ☐ G2® Vena Cava Filter
- ☐ G2® Express Vena Cava Filter
- ☐ G2® X Vena Cava Filter
- ☐ Eclipse® Vena Cava Filter
- ☐ Meridian® Vena Cava Filter
- ☒ Denali® Vena Cava Filter
- ☐ Other: _____

11. Date of Implantation as to each product:

~~September 17, 2014~~ February 26, 2014 _____

12. Counts in the Master Complaint brought by Plaintiff(s):

- ☒ Count I: Strict Products Liability – Manufacturing Defect
- ☒ Count II: Strict Products Liability – Information Defect (Failure to Warn)
- ☒ Count III: Strict Products Liability – Design Defect
- ☒ Count IV: Negligence - Design
- ☒ Count V: Negligence - Manufacture

- 1 ☒ Count VI: Negligence – Failure to Recall/Retrofit
- 2 ☒ Count VII: Negligence – Failure to Warn
- 3 ☒ Count VIII: Negligent Misrepresentation
- 4 ☒ Count IX: Negligence *Per Se*
- 5 ☒ Count X: Breach of Express Warranty
- 6 ☒ Count XI: Breach of Implied Warranty
- 7 ☒ Count XII: Fraudulent Misrepresentation
- 8 ☒ Count XIII: Fraudulent Concealment
- 9 ☒ Count XIV: Violations of Applicable ~~Mississippi and Louisian~~Ohio and
10 aFlorida Law Prohibiting Consumer Fraud and Unfair and Deceptive
11 Trade Practices
- 12 ☐ Count XV: Loss of Consortium
- 13 ☐ Count XVI: Wrongful Death
- 14 ☐ Count XVII: Survival
- 15 ☒ Punitive Damages

16 Other(s): _____ (please state the facts supporting this
17 Count in the space immediately below)

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21 Jury Trial demanded for all issues so triable?

22 ☒ Yes

☐ No

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RESPECTFULLY SUBMITTED on this ~~29~~21st ~~th~~ day of June, 2019.

CURTIS LAW GROUP

By: /s/ William B. Curtis
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Attorney for Plaintiff

I hereby certify that on this ~~29~~21st ~~th~~ day of June, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ William B. Curtis
William B. Curtis